OSHA COMPLIANCE CHECKLIST

For Printers

The Short Version

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This checklist is being provided to highlight some of the essential OSHA compliance obligations a printer may be required to meet. This checklist should be used as only a beginning to environmental compliance obligations as it is limited in scope, content, and is not all inclusive. A more extensive checklist is available from the Graphic Arts Technical Foundation at 412/741-6860.

Although every reasonable effort has been made to verify information contained in this publication, PNEAC does not assume responsibility for completeness, accuracy, or interpretation of the same. It is the responsibility of the printer to contact the respective federal/state/local agency for the specific requirements or any additional regulations.

General Recordkeeping

[ ] Create a central and duplicate filing system for originals and working files.

[ ] Summarize all conversations/interactions with agency personnel, including names, dates, times, and subject matter.

[ ] Put all correspondence in writing and send certified mail with return receipt.

[ ] Develop data collection system and assign duties to responsible employees.

Specific Recordkeeping/Reporting

[ ] Post OSHA notice informing workers of safety and health protections and obligations under federal law.

[ ] Post notice informing employees of right to access medical and exposure records.

[ ] Suggest using a dedicated bulletin board for safety notices.

[ ] Maintain OSHA form 200, log, and summary of recordable workplace injuries and illnesses sign, and post summary portion from every February 1 to March 1 for the previous year. Keep forms for five years.

[ ] Form 101, a supplement to form 200, must be available within six (6) working days of the incident. Worker's compensation report can be used as a substitute.

[ ] Retain medical and employee exposure records, except for first-aid records, for 30 years after the employee leaves the company. Records for workers employed less than one year do not need to be retained. MSDSs for products no longer in use need not be retained for 30 years as long as a record of each substance's identity and where and when it was used is kept for 30 years.

[ ] Report any accident resulting in a fatality or causing the hospitalization of five or more employees to OSHA within 8 hours of occurrence.

[ ] Development and posting of written safety policy is suggested.

[ ] Post emergency contacts and phone numbers in prominent location including next to phones.

[ ] Post warning signs in appropriate places (e.g., high noise, high voltage, no smoking, hazardous waste, and flammable material storage areas), and post signs that indicate if personal protective equipment (e.g., goggles, gloves, respirators) needs to be used.

[ ] Keep operating permits for elevators, air pressure tanks, and liquefied petroleum gas tanks current.

Hazard Communication

[ ] Written hazard communication program.

[ ] Create and maintain list or inventory of all current OSHA hazardous substances.

[ ] Obtain and maintain MSDSs for all OSHA hazardous chemicals and products with hazardous chemicals in them. Make MSDSs available to all employees.

[ ] On a periodic basis (e.g., about every three years), place outdated MSDSs in an inactive file and retain for 30 years. In lieu of retaining inactive MSDSs, retain record of chemical identity and where and when it was used for 30 years.

[ ] Appropriate labeling of chemical identity and hazard warning for all inplant containers, except for immediate-use containers, which are defined as those under the exclusive control of the person who filled them with chemicals that will be completely used by the end of the worker's shift.

[ ] Employee training program with appropriate documentation. Training required for all new hires prior to them starting, when new chemicals are introduced into the workplace, and for all part-time and seasonal employees.

Personal Protective Equipment

[ ] Perform workplace hazard assessment to determine if hazards are present or are likely to be present which necessitates the use of personal protective equipment.

- [ ] Written certification that assessment was completed.
- [ ] Identify the workplace evaluated.
- [ ] Identify certifying person.

[ ] Must supply appropriate PPE unless other non-work related use is identified.

[ ] Require affected employees to wear the PPE.

[ ] Ensure the PPE fits employee properly.

[ ] Do not use defective or damaged PPE.

[ ] Institute employee training/retraining program covering:

- [ ] When PPE is necessary.
- [ ] What PPE is necessary.
- [ ] How to properly put on, take off, adjust, and wear PPE.
- [ ] Limitations of the specific PPE.
- [ ] Proper care and maintenance.
- [ ] Useful life of PPE.
- [ ] Proper disposal of PPE.

[ ] Each employee must demonstrate an understanding of the training and ability to properly use the PPE prior to performing duties.

[ ] Retraining is required when changes in the types of PPE used, hazards change, or employee's knowledge is inadequate.

[ ] Maintain training records identifying employees trained, date of training, type of training, and retraining date and type.

[ ] ***Eye and Face Protection:***

[ ] All employees exposed to eye and face Hazards must wear PPE.

[ ] Prescription/Non Interfering eye PPE must be provided.

[ ] Eye and face PPE must meet ANSI Z81.1-1989 or previous version.

[ ] Eye PPE (e.g., goggles, glasses, and face shields) required to have side protection wherever chance of flying objects, dusts, or chemicals exist and eye injury could result.

[ ] Requirement for eye protection enforced, not an option.

[ ] Sufficient cleaning stations for eye protection devices located strategically around the plant.

[ ] Eyewash fountains where necessary, clean, and operable. Several portable (e.g., squeeze bottles) and at least one continuous-flow station located strategically around the plant.

[ ] Although not definitively proven to increase risk or severity of injury, use of contact lenses should be avoided where chemicals or other hazardous materials could injure the eye.

[ ] Post warning sign near all UV light sources (e.g., platemaking, contact frame, and presses/coating units).

[ ] ***Foot Protection:***

[ ] Each affected employee shall wear protective footwear when working in areas where there is a danger of foot injuries due to:

[ ] Falling and rolling objects.
[ ] Objects that could pierce the sole.
[ ] Where feet are exposed to electrical hazards.

[ ] Footwear bought after 7/5/94 must comply with ANSI Z41-1991.

[ ] Footwear Bought Before 7/5/94 Must Comply With ANSI Z41-1967.

[ ] Safety shoes with neoprene soles worn where floor is slippery. Some employees (e.g., maintenance personnel) require steel-toed and metatarsal-protected shoes.

[ ] Tennis shoes, open-toed shoes, and similar footwear not worn unless equipped with ANSI-approved toe caps.

[ ] ***Hand Protection:***

[ ] Hand PPE (e.g., gloves) worn when exposure to chemicals, absorption of harmful substances, severe abrasions, cuts, punctures, chemical or thermal burns, mechanical injury or exposure to extreme temperatures can occur.

[ ] Hand PPE properly selected for the hazard.

[ ] Institute glove inspection programs designed to detect and replace damaged or leaking gloves.

[ ] Use barrier creams when gloves cannot be used and skin protection is needed from chemicals or other potentially harmful substances like UV light.

[ ] ***Head Protection:***

[ ] Protective helmets shall be worn when working in areas where there is the potential for injury from falling objects.

[ ] Helmets bought after 7/5/94 must comply with ANSI Z89.1-1986.

[ ] Helmets bought before 7/5/94 must comply with ANSI Z89.1-1969.

[ ] ***Respiratory Protection:***

[ ] Evaluate workplace to determine if respirators are required (e.g., confined spaces and areas of overexposure to harmful substances like chemical vapors or dusts).

[ ] Individual assigned responsibility of coordinating program.

[ ] Written program outlining use of equipment and circumstances for use, including medical testing for employees prior to use of units.

[ ] Respirator selection specific to hazard.

[ ] Fit testing must be conducted for each employee. Make sure that no facial hair will interfere with proper sealing of respirator.

[ ] Proper storage, cleaning, and maintenance program.

[ ] Institute training program on proper use and limitations of respirators.

Machines and Machine Guarding

[ ] All moving parts (rollers, chains, belts, couplings, ingoing nips, etc.) guarded where accidental contact producing significant injury can occur.

[ ] Existing guards undamaged and in place.

[ ] Machine not operated with missing guards.

[ ] Employee training program on proper placement of guards, use of "stop/safe/ready" button system, and safe cleaning procedures.

[ ] "Stop/safe/ready" buttons adequate, operational, and used as necessary.

[ ] Housekeeping good in, around, and under machine.

[ ] ***Bindery equipment:***

[ ] Rollers and other moving parts well-guarded at choke (or jam-up) points.

[ ] Semiskilled and unskilled employees instructed on proper handling of choke-ups.

[ ] Procedures used to avoid all possible contact with knife edges.

[ ] "Stop/safe/ready" buttons adequate, operational, and used as necessary.

[ ] Provide adequate aisles and crossover walkways with handrails over conveyor systems.

[ ] ***Presses:***

[ ] Finger guards in place and adjusted properly.

[ ] "Stop/safe/ready" buttons adequate, operational, and used as necessary.

[ ] Start-up alarm present and working.

[ ] Emergency tools present and in proper location.

[ ] Excessive oil cleaned up frequently.

[ ] Catwalks and grating clean and free of debris.

[ ] Dust vacuumed (blowing with an air hose creates explosion hazard).

[ ] ***Conveyors:***

[ ] Nip point between belt and take-up roller guarded.

[ ] Provide adequate crossover walkways with handrails for long-belt systems or access points.

[ ] Sufficient "stop" buttons.

[ ] Belt shut down for cleaning and maintenance.

[ ] Warning start-up system for long conveyors in place and operating.

Control of Hazardous Energy or Lockout/Tagout Program

[ ] Applies to maintenance or servicing activities and not production activities.

[ ] Requires written and employee training program. Program must include an inventory of energy sources and equipment controlled by them.

[ ] Requires release of stored energy sources and blocking of energy sources before maintenance activities can begin.

[ ] Breakers, breaker box, and air lines, etc., must be retrofitted to accept lock when they are repaired or overhauled. OSHA strongly "suggests" that minor retrofitting should be performed prior to any replacement or overhauling activities.

[ ] Each employee attaches or applies own lock and tag, and allowed to remove only that lock.

[ ] Where equipment cannot be locked out, tags must be provided and used.

[ ] Multi-shift personnel need to be informed of lockout purpose.

[ ] Outside contractors need to be informed of lockout/tagout procedure.